

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:) Case No. 23-42154
Shauntay Bartlett,) Chapter 13
)
)
) Debtor's Motion to Modify and Set Reasonable
Movant,) Security Deposit Pursuant to 11 U.S.C. § 366(b)
)
) Motion No. _____
vs.)
)
AmerenUE,) RESPONSE DUE: (July 21, 2023)
)
)
)

**DEBTOR'S MOTION TO MODIFY AND SET REASONABLE SECURITY DEPOSITS
PURSUANT TO 11 U.S.C. § 366(b) AND NOTICE OF HEARING**

**THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU
OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING
PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT
AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING
PARTY.**

**YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 30 DAYS OF THE DATE
THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION
SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE
RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU.**

**IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT,
YOU MUST ATTEND THE HEARING, THE DATE OF WHICH WILL BE SENT TO
YOU IF YOU FILE A RESPONSE. UNLESS THE PARTIES AGREE OTHERWISE,
THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE
THE MOTION AT THE HEARING.**

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.

COMES NOW Debtor, Shauntay Bartlett, pursuant to 11 U.S.C. § 366(b), and for her
Motion to Modify and Set Reasonable Security Deposits, state to the Court as follows:

1. Debtor filed the Chapter 13 case with the Court on or about June 21, 2023.
2. Debtor has an account with the public utility company AmerenUE for utility service at

the Debtor's principal residence located at 4350 Cottage Avenue, St. Louis, MO 63113.

3. Said utility company is presently demanding a deposit in a large amount for the Debtor's continued utility service.
4. Debtor submits that imposing such a deposit is unreasonable under the circumstances.
5. Debtor submits that a reasonable deposit for the utility company is \$100.00 payable at a rate of \$20.00 per month.

WHEREFORE, Debtor prays this Court enter an Order granting Debtor's Motion to Modify and Set Reasonable Security Deposits Pursuant to 11 U.S.C. § 366(b); and for such other and further relief as the Court deems necessary and proper in the circumstances.

Respectfully Submitted
The Consumer Law Center of St. Louis, L.L.C.

/s/ **David N. Gunn**
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was filed electronically on June 21, 2023 with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, address to those parties listed below on June 21, 2023.

/s/ *Lacy Scroggins*

Lacy Scroggins, Paralegal

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